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Attorneys for Defendant
BMW of NORTH AMERICA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MONITA SHARMA and ERIC ANDERSON,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

BMW OF NORTH AMERICA, LLC, a
Delaware Limited Liability Company,

Defendant.

Case No. 3:13-cv-02274-MMC

**STIPULATION AND ~~PROPOSED~~
ORDER RE: CLASS CERTIFICATION
BRIEFING SCHEDULE**

Judge: Maxine M. Chesney

Pursuant to Northern District of California Civil Local Rules 6-1(b), 6-2 and 7-12,
Plaintiff Eric Anderson (“Plaintiff”) and Defendant BMW of North America, LLC (“BMW NA”
or “Defendant”), by and through their respective attorneys, hereby stipulate as follows:

STIPULATION

WHEREAS, on September 9, 2016, the Court entered an order setting a class certification
briefing schedule (Dkt. No. 179);

WHEREAS, the Parties are engaged in mediation and agree that it would be mutually
beneficial to allow for the mediation and related discussions to occur;

STIPULATION AND ~~PROPOSED~~ ORDER
RE: CLASS CERTIFICATION BRIEFING
SCHEDULE 3:13-CV-02274-MMC

NOW, THEREFORE, undersigned counsel for the Parties, having met and conferred, stipulate and agree that there is good cause for a modification to the upcoming case schedule as follows:

1. December 2, 2016 – Plaintiff to file motion for class certification
2. January 27, 2017 – Deadline for Plaintiff to produce his experts for deposition
3. March 6, 2017 – BMW NA to file opposition to class certification motion
4. March 31, 2017 – Deadline for BMW NA to produce its experts for deposition
5. April 24, 2017– Plaintiff to file reply in support of class certification motion
6. May 26, 2017 at 9:00 a.m. or as soon thereafter as the motion may be heard – Hearing on Plaintiff’s motion for class certification

IT IS HEREBY STIPULATED.

Dated: October 18, 2016

KERSHAW, COOK & TALLEY PC

By: /s/ William A. Kershaw

William A. Kershaw

Attorneys for Plaintiff and the putative Class

Dated: October 18, 2016

SQUIRE PATTON BOGGS (US) LLP

By: /s/ Troy M. Yoshino

Troy M. Yoshino

Attorneys for Defendant

BMW of NORTH AMERICA, LLC

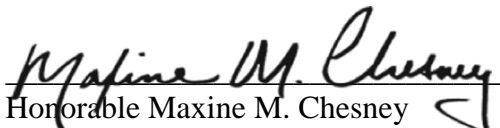
Civil L.R. 5-1(i) Certification

The filing attorney hereby certifies that concurrence in the filing of the document has been obtained from each of the other signatories, in full accordance with Civil Local Rule 5-1(i).

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 19, 2016


Honorable Maxine M. Chesney
SENIOR DISTRICT JUDGE
UNITED STATES DISTRICT COURT

SQUIRE PATTON BOGGS (US) LLP
275 Battery Street, Suite 2600
San Francisco, California 94111

STIPULATION AND ~~PROPOSED~~ ORDER
RE: CLASS CERTIFICATION BRIEFING
SCHEDULE 3:13-CV-02274-MMC